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**Proliferation of Programmable Radios  
on unauthorized frequencys in various  
other radio service under FCC regulation!**

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life time permit with the needed fixed one time fee. Free updates by the licensee on status of business must be addressed 1 time every 10 years. Change of addresses must take place via the ULS no less than 10 days from change of address.

Each "Radio Programme" would be required to keep a file on each customer or user showing proof of authorization, name, address, telephone number, and other data need to find the end user. The frequencies and emissions / power levels must be part of the recordkeeping! The record shall be open to the FCC and Local Law Enforcement, but not a Public Record for others review.

Federal Employees or Agents are not subject to this radio programming rule in their duties loading or changing frequencies for the agency they are employed by! The rule doesn't apply in this rule making to off duty work not under the direct control of the Federal agency.

The Rule Making Request also shall apply even if the "Programming" is done for "Free" or "No Charge" by the radio programmer.

In this request it is suggested that the programming first apply to the following bands of frequencies and later to other as times and rules changes in the future are needed!

- [1] Frequencies between 29.705 Mhz to 49.995 Mhz
- [2.] Frequencies between 72.000 Mhz to 76.000 Mhz
- [3.] Frequencies between 140.000 Mhz to 220.000 Mhz \* \* \*
- [4.] Frequencies between 400.000 Mhz to 1,800.000 Mhz

The "Radio Programmers Permit" shall not apply to any SMR, Cell Telephone, PCS Telephone, or any wireless system that using authorized radio and wireless communications frequencies for service to the general public. This exemption to requirement shall apply to future for public utility type wireless systems that also interconnect This above industry is well regulated and there is no need for fcc control

\* \* \* Radio users in the Amateur Radio Service shall not be subject to this requirement for a "Radio Programmers Permit" as long as operations is confined to authorized "Amateur Radio Frequency Bands" Holders of the "Extra Class" Amateur radio license may do programming for free to end users as a example for MARS or Civil Air Patrol on a need for public safety and service. The "WTB" bureau of the fcc will publish a guidelines as to what free programming a "Extra" Class Amateur radio operators can do with out a "Programmers Permit"

Establishing a requirement for a "Permit" or "License" to program future radios to see that the "End" user is not on Police or Fire / Public Safety Frequencies to cause enforcing problems is the issue.

Putting the "programmer" under fcc controls and subject to strict actions to stop the future problems is a must. Under the current modes of enforcement the end users is punished when found, and the present programmers is still selling and programming out of band radios. The drafting of the Exam should be the duties of the various CE Commercial Exam Stations.

It is suggested that the FCC fee be at least 3 to 5 time's the Exam Fee Charged by the Commercial Radio Exam Station. Putting the retail vendor that sell's programmable radios to the public under FCC controls is the only way to put a dent into enforcement!

Input from the radio community is also need to help stop the Proliferation of Programmable radio users using illegal or unauthorized frequencies. Control of Soft Ware and Computer program boxes have not worked. Record keeping and FCC spot inspection of the programmers will aid in putting the Illegal Programmers out of business. The business man who conducts legal radio service may have to keep record a bit longer only!

Thanks,

Dale E. Reich

